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Mr. Tom Karman  
Wisconsin Department of Natural Resources (AM/7)  
P.O. Box 7921  
Madison, WI 53707-7921

April 9, 2014

Subject: CAIR NOx Allocation Request for 2013

Dear Mr. Karman:

Manitowoc Public Utilities requests a CAIR NOx annual allowance allocation as allowed under NR 432.03(3)(b), and a CAIR NOx ozone season allowance allocation as allowed by NR 432.05(3)(b) for our unit 9.

Per our EPA ECMPS feedback report for the fourth quarter of 2013 unit 9 emitted a total of 20.1 tons of NOx during 2013 and of that total 13.1 tons of NOx were emitted during the ozone season. Attached please find a copy of the fourth quarter EPA ECMPS feedback report documenting the emissions during 2013.

Manitowoc Public Utilities therefore requests a CAIR NOx annual allowance allocation of 20.1 tons per NR 432.03(3)(c) for 2013, and a CAIR NOx ozone season allowance allocation of 13 tons per NR 432.05(3)(c) for 2013. Please credit the allocations to the following:

Facility: Manitowoc  
ORISPL: 4125  
Account Number: 004125 FACLT

If you have any questions regarding this submission, or require additional information, please contact me.

This document emailed on April 9, 2013 to [Thomas.karman@wisconsin.gov](mailto:Thomas.karman@wisconsin.gov) and followed with a mailed hard copy.

MPU03857

Sincerely,

*Thomas E. Reed*

Thomas E. Reed, P.E.  
Environmental Engineer  
ARP/CAIR Designated Representative  
Manitowoc Public Utilities  
Phone: 920-686-4384  
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This letter emailed September 10, 2013 to Mr. Tom Karman, [Thomas.Karman@Wisconsin.gov](mailto:Thomas.Karman@Wisconsin.gov)

cc. Nilaksh Kothari - (MPU)  
Red Jones – (MPU)  
Jerry Ahlswede - (MPU)  
Tim Harding - (MPU)  
Scott Karbon - (MPU)

Source: Y:\Group File Folders\Reed\1-Tom Reed\Air\CAIR\2013 Unit 9 CAIR Allowance Request.docx



# ECMPS Client Tool

Version 1.0 2013 Q3

United States Environmental Protection Agency (EPA)  
Emissions Collection and Monitoring Plan System (ECMPS) Feedback

January 23, 2014 03:04 PM

Re: Manitowoc (4125) - 9

Dear Certifying Official:

Thank you for submitting your Quarterly Emissions Report using the U. S. EPA's Emissions Collection and Monitoring Plan System (ECMPS) software. This ECMPS Feedback report provides you with a detailed submission receipt, a summary of the evaluations performed on your submission, and guidance on any follow-up actions needed if any errors were found. EPA has also received a copy of this Feedback Report as part of your submission.

## SUBMISSION STATUS

The EPA has received your Quarterly Emissions Report for the Facility and Monitoring Location(s) listed in Table 1 below. The Table also provides confirmation of EPA's receipt (Date, Time, etc.) of your submission. Prior to submission ECMPS evaluated your emissions report and assigned an overall "Error Status Level" to it, based on the results (see Table 1). This Feedback Report also contains Table 2, which displays EPA-Accepted Cumulative Values for emissions and other parameters. Finally, a summary of ECMPS's Evaluation Results is included.

**Table 1: Submission Receipt and Error Status Level Information**

Report Received for Facility ID (ORIS Code):	4125
Facility Name:	Manitowoc
State:	WI
Monitoring Locations:	9
Submission Type:	EM for 2013 QTR 4
Error Status Level:	Informational Message
Submission Date/Time:	01/23/2014 3:04:17 PM
Submitter User ID:	tharding
Submission ID:	745925
Resubmission Required:	No
EPA Analyst:	Louis Nichols; (202) 343-9008; nichols.louis@epa.gov

## EXPLANATION OF YOUR ERROR STATUS LEVEL LISTED IN TABLE 1

The EPA has accepted your Emissions data submission. ECMPS detected no errors in your data based on the checks performed; however, the Evaluation Results at the end of this Feedback Report contain one or more Informational Messages. If any of the Informational Messages indicates a reporting problem, the EPA strongly encourages you to correct the problem(s) and resubmit the data. NOTE: the ECMPS submission access window for this Emissions report has been closed. If you need to resubmit this data, please see the DATA RESUBMISSION guidance, below.

## OTHER INFORMATION AND BULLETINS FROM EPA

**QUESTIONS:** Please contact your EPA Analyst listed in Table 1 with any questions regarding this submission and the evaluation results. If you need assistance with correcting problems in the Emissions data for this facility, please send an e-mail to ECMPS Technical Support at: [ecmps-support@camdsupport.com](mailto:ecmps-support@camdsupport.com).

**DATA RESUBMISSION:** If you need to resubmit emissions data, including for previous calendar quarters, please complete the ECMPS Data Resubmission Request Form located at: [http://ecmps.camdsupport.com/help\\_resubmit\\_form.shtml](http://ecmps.camdsupport.com/help_resubmit_form.shtml). Please provide detailed documentation of the reasons for the resubmission. Support staff will review your request and notify you via e-mail when the necessary database access window has been granted for your resubmission.

**TECHNICAL SUPPORT:** please visit the ECMPS Technical Support website at: <http://ecmps.camdsupport.com> for information about ECMPS software downloads, ECMPS News, Technical Support, documentation, tutorials, FAQs, and more.

**ECMPS Data Reporting Instructions:** for detailed information about reporting Monitoring Plan, QA/Certification Test, and Emissions data, please see the ECMPS Reporting Instructions on the EPA's website at: <http://www.epa.gov/airmarkets/business/ecmps/reporting-instructions.html>.

If you have any questions regarding this correspondence, please feel free to contact your EPA Analyst listed in Table 1 as soon as possible. Thank you for your attention to this matter.

**Facility Name: Manitowoc**

**Facility ID (ORISPL): 4125 State: WI**

**ECMPS Feedback**

January 23, 2014 03:04 PM

**Table 2: Cumulative Data Summary -- EPA-Accepted Values**

Unit/Stack/Pipe ID: 9

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Ozone Season	Year-to-Date
Number of Operating Hours	90	546	1,010	686	1,556	2,332
Operating Time (hrs)	87.01	541.79	1,001.29	683.90	1,543.08	2,313.99
SO2 Mass (tons)	2.1	22.6	48.6	30.7		104.0
CO2 Mass (tons)	2,166.8	19,883.7	40,636.3	25,283.3		87,970.1
Heat Input (mmBtu)	20,334	188,988	384,454	238,977	573,442	832,753
NOx Emission Rate (lb/mmBtu)	0.114	0.063	0.049	0.052		0.056
NOx Mass (tons)	1.2	5.0	8.1	5.8	13.1	20.1

## EVALUATION RESULTS

### Hourly Data

Unit/Stack/ Pipe	Severity	Check Code / Result	Result Message	Begin Date / Hour	End Date / Hour	Consecutive Hours
9	INFORM	HOURCV-39-G	Warning: The AdjustedHourlyValue reported in the DHV record for HI is in excess of the maximum value listed in the monitoring plan. Sources are required to periodically (at least once annually) evaluate the appropriateness of these maximum values in the monitoring plan and make proper adjustments when necessary. Adjustments may include the need to update Span, Default, and/or Unit Capacity values. You should investigate the cause of these exceedances and determine whether adjustments to your monitoring systems or monitoring plan are necessary.	12/10/2013 07	12/10/2013 07	1